

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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In re	:	Chapter 11
	:	
TERRAFORM LABS PTE. LTD., et al.,	:	Case No. 24–10070 (BLS)
	:	
	:	(Jointly Administered)
	:	
Debtors.¹	:	Objection Deadline: August 30, 2024 at 4:00 p.m. (ET)
	:	
	X	

NOTICE OF FEE APPLICATION

PLEASE TAKE NOTICE that Dentons US LLP (the “**Applicant**”) has today filed the attached *Fifth Monthly Fee Application of Dentons US LLP as Special Counsel for the Debtors and Debtors in Possession for Allowance of Compensation and Reimbursement of Expenses for the Period from June 1, 2024 through June 30, 2024* (the “**Application**”) with the United States Bankruptcy Court for the District of Delaware (the “**Court**”).

PLEASE TAKE FURTHER NOTICE that objections to the Application, if any, must be made in accordance with the *Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals and (II) Granting Related Relief*, dated February 29, 2024 [Docket No. 99] (the “**Interim Compensation Order**”) and must be filed with the Clerk of the Court, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801 no later than **4:00 p.m. (prevailing Eastern Time) on August 30, 2024** (the “**Objection Deadline**”) and served upon: (i) the Debtors, c/o Terraform Labs Pte. Ltd. (Attn: Ashwin Mathialagan (ashwin@terra.money), Peter Hsieh (peter.hsieh@terra.money), Chris Amani (amani@terra.money), Michael Leto (mleto@alvarezandmarsal.com), and Julie Hertzberg

¹ The Debtors in these chapter 11 cases are: Terraform Labs Pte. Ltd. and Terraform Labs Limited. The Debtors’ principal offices are located at 1 Wallich Street, #37-01, Guoco Tower, Singapore 078881.

(jhertzberg@alvarezandmarsal.com)); (ii) counsel for the Debtors, (a) Weil, Gotshal & Manges LLP (Attn: Ronit Berkovich, Esq. (ronit.berkovich@weil.com) and Jessica Liou, Esq. (jessica.liou@weil.com)) and (b) Richards, Layton & Finger, P.A. (Attn: Paul N. Heath, Esq. (heath@rlf.com), Zachary I. Shapiro, Esq. (shapiro@rlf.com), and Matthew P. Milana, Esq. (milana@rlf.com)); (iii) the Office of the United States Trustee for the District of Delaware (Attn: Linda Richenderfer, Esq. (Linda.Richenderfer@usdoj.gov)) and (iv) counsel to the Official Committee of Unsecured Creditors, (a) McDermott Will & Emery LLP (Attn: David R. Hurst, Esq. (dhurst@mwe.com), Dante Pavan, Esq. (dpavan@mwe.com), Darren Azman (dazman@mwe.com), Joseph B. Evans (jbevans@mwe.com) and Gregg A. Steinman (gsteinman@mwe.com)).

PLEASE TAKE FURTHER NOTICE that if no objections to the Application are filed prior to the Objection Deadline, the Applicant may file a certificate of no objection with the Court, after which the Debtors shall be authorized by the Interim Compensation Order to pay the Applicant an amount equal to 80% of the fees and 100% of the expenses requested in the Application without the need for further order of the Court.

PLEASE TAKE FURTHER NOTICE that if an objection to the Application is filed prior to the Objection Deadline, the Debtors shall be authorized by the Interim Compensation Order to pay the Applicant 80% of the fees and 100% of the expenses requested in the Application not subject to such objection without the need for further order of the Court.

Dated: August 9, 2024
Wilmington, Delaware

Respectfully submitted,

/s/ Matthew P. Milana

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